

Hamilton County Municipal Court, Cincinnati, Ohio
Small Claims Complaint

11CV18599

ALICE WOODWARD

Case No. _____

4240 Green Arbors Lane

☒ In accordance with civil rule 4.6 (C) or (D) and
 4.6 (E), an ordinary mail waiver is requested

Cincinnati, Ohio 45249

Plaintiff(s)

Phone Number _____

VS.

Amount \$ 3,000.00

WINDHAM PROFESSIONALS

380 Main Street

CERT. MAIL

Salem, NH. 03079

Defendant(s)

 Plaintiff says that there is due and owing from the defendant(s) the sum of Three Thousand -----00/100 dollars

For the following reason(s):

See Attached Complaint

Interest, if applicable, from the _____ day of _____, Plus Court Costs.

ATTENTION: ALLOW SUFFICIENT TIME TO ENTER THE COURTHOUSE DUE TO SECURITY CHECK. DELAYS POSSIBLE.

Notice and summons in action for money only

To: (1) Edward M. Sheehan, III

(2) _____

380 Main Street

Salem, NH 03079

Notice to the Defendant: The court will hold trial on this claim at the Hamilton County Courthouse, 1000 Main St., Rm. 265 at 9:00 A.M., on:
8-5-11

If you do not appear at the trial, judgment may be entered against you by default, and your earnings may be subject to garnishment, or your property may be attached to satisfy the judgment. If your defense is supported by witnesses, account books, receipts, or other documentation, you must produce them at the trial. Subpoenas for witnesses, if necessary, should be filed with the clerk at least seven (7) days before the trial. If you believe you have a claim against the plaintiff, you must file a counterclaim with the court and must serve the plaintiff and all other parties with a copy of the counterclaim at least seven (7) days prior to the trial date of the plaintiff's claim. **All filings to be filed/mailed with the appropriate fees to: Hamilton County Clerk of Courts 1000 Main St. Rm. 115, Cincinnati, Ohio 45202.** If you admit the claim but desire time to pay, you may make such a request at the trial.

Memorandum to the Plaintiff

 Bring your evidence and witnesses, if any, with you. Subpoenas for witnesses, if necessary, must be filed with the clerk at least seven (7) days before the trial date. **On accident cases involving a motor vehicle, you must bring your title to the vehicle.**

Plaintiff further states that to the best of their knowledge the defendant is / is not a member of the Armed Forces of the United States of America.

X

Signature of Plaintiff/Attorney _____

Attorney Address _____

513-929-4040

Phone No.

0067295

Attorney ID No.

Subscribed and sworn to before me this _____

day of _____

, 20 _____

MICHAEL TODD McINTOSH
 Attorney at Law
 Notary Public, State of Ohio
 My Commission Has No Expiration
 Date: Section 147.03 O.R.C.

Clerk, Deputy Clerk, Notary Public

**HAMILTON COUNTY MUNICIPAL COURT
SMALL CLAIMS DIVISION
HAMILTON COUNTY, OHIO**

ALICE WOODWARD : **NO:**
4240 Green Arbors Lane :
Cincinnati, Ohio 45249 :

Plaintiff :

v. :

WINDHAM PROFESSIONALS :
380 Main Street :
Salem, NH 03079 :

AGENT:

Edward M. Sheehan, III :
380 Main Street :
Salem, NH. 03079 :

Defendants :

**COMPLAINT FOR STATUTORY DAMAGES UNDER THE FAIR DEBT
COLLECTION PRACTICES ACT, PURSUANT TO 15 U.S.C. §1692, *ET SEQ*
AND OHIO REVISED CODE §1319.12 *ET SEQ***

Comes now the Plaintiff, by and through counsel, and hereby states for her claim
as follows:

JURISDICTION AND VENUE

1. Pursuant to 15 U.S.C. 1692(h), §813(b)(2)(d) this action may be brought in
any Court of competent jurisdiction.

FACTS

2. Windham Professionals was employed as third party debt collector to collect a
debt on a stolen bank card which was reported to the police.

3. Said debt has been denied by Plaintiff.

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HAMILTON COUNTY
CLERK OF COURT
JULY 28 2011

4. Windham Professionals is a Defendant herein.
5. Windham Professionals contacted Plaintiff with respect to said debt.
6. Within thirty (30) days of receiving the notification form from the third party debt collector, Plaintiff denied the debt.
7. Plaintiff thereafter retained counsel.
8. Defendant, Windham Professionals., was contacted by Plaintiff's counsel and was asked to forward proof of said debt. (Attached Exhibit "A").
9. Defendant, Windham Professionals., failed to comply in violation of 15 U.S.C. 1692 *et seq.*
10. Pursuant to 15 U.S.C. 1692(k) §813, Defendant is liable to Plaintiff for failing to verify the debt upon proper request.
11. Plaintiff has suffered damages and attorneys' fees.

WHEREFORE, Plaintiff requests statutory damages of \$3,000.00 from the Defendant, for attorneys' fees, court costs and for any and all other relief which this Court may deem just and appropriate.

Respectfully submitted,

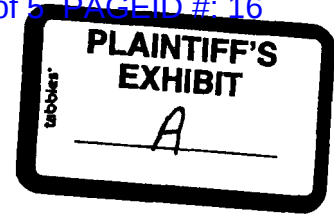
McINTOSH & McINTOSH

By _____
A. Brian McIntosh
Reg. #89266
Attorney for Plaintiff
1136 St. Gregory Street, Suite 100
Cincinnati, Ohio 45202
513-929-4040

TO THE CLERK

Please issue certified mail service of the Summons and Complaint on the Defendants at their last known addresses of:

**Edward M. Sheehan, III
380 Main Street
Salem, NH. 03079**



May 13, 2011

Windham Professionals
P.O. Box 946
Hendersonville, TN. 37077

RE: Alice Woodward
Account Numbers: 1101721 and 1101722

To Whom It May Concern:

This letter is to confirm that I am the attorney representing Alice Woodward with respect to the above captioned accounts. My client, at this time, would like to request verification of the debts pursuant to the Fair Debt Collection Practices Act 15 U.S.C. §1692, *et seq.* Please do not contact me client for any purposes in the future. All correspondence should be directed to me at the above address and/or telephone numbers.

Sincerely.

McINTOSH & McINTOSH

By _____
A. Brian McIntosh

ABMcI:fw